

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Docket No: 1:05-cr-10204-GAO

UNITED STATES OF AMERICA

vs.

PAUL HICKS

DEFENDANT'S LIST SUGGESTED VOIR DIRE QUESTIONS

The defendant moves this court pursuant to Federal Rule of Criminal Procedure 24(a)(2)(B) to pose additional VOIR DIRE questions to prospective jurors. These shall include the following:

1. The government has charged the defendant with one count of being a felon in possession of a firearm in violation of Title 18, U.S.C., section 922(g), and one count each of possession with intent to distribute cocaine base and powder each in violation of Title 21, U.S.C., section 841(a)(1). Do you have strong opinions about guns or drugs that would make it difficult for you to be a fair and impartial juror in this case.
2. The defendant is an African American male. Do you have an opinion about African American males and their involvement in the use of guns and or drugs

that would make it difficult for you to be a fair and impartial juror in this case.

3. The government may call local, state, and federal law enforcement officers to testify in this matter.

Would you tend to believe or favor the testimony of one of these witnesses merely because he or she is a law enforcement officer.

4. You may learn that the defendant has a past criminal record and has been incarcerated. Would this information make it difficult for you to be a fair and impartial juror in this case.

Counsel for the defendant,

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Dated: October 15, 2006